

AO 91 (Rev. 11/11) Criminal Complaint

FILED

May 09, 2024

UNITED STATES DISTRICT COURTCLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

for the

Western District of Texas

BY: Myrna Gallegos
DEPUTY

United States of America)

v.)

April Marylou CORNEJO;)

Candy Valerie CORNEJO;)

Isaac David CORNEJO; Brian Aron CHAIREZ)

Case No. **EP-24-MJ-1939** -ATB

(1, 2, 3, 4)

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 8, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. § 1324(a)(1)(A)(ii)

Transportation of illegal aliens.

8 U.S.C. § 1324(a)(1)(A)(v)(I)

Conspiracy to transport illegal aliens.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.
Complainant's signature

Gilberto Herrera, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/09/2024
Judge's signatureCity and state: El Paso, Texas

Anne T. Berton, U.S. Magistrate Judge

Printed name and title

Complaint sworn to telephonically on
May 09, 2024 at 1:38 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

AFFIDAVIT

On May 8, 2024, at approximately 2:39 AM, a United States Customs and Border Protection Officer (CBPO) assigned to the Bridge of the Americas Port of Entry in El Paso, Texas was conducting primary immigration inspections. At that time, April Marylou CORNEJO presented herself for inspection at the primary inspection booth as the driver of a black Chevrolet Tahoe bearing a Texas license plate (SUSPECT VEHICLE). At that time, A. CORNEJO presented documents for herself and five (5) additional passengers. Identification documents were presented for Candy Valerie CORNEJO, Isaac David CORNEJO, Brian Aron CHAIREZ, and minors, ENV and AEC.

Upon conducting queries on the documents, the CBPO received a system generated alert. During the primary inspection, the CBPO asked whose child Vela was. C. CORNEJO stated Vela was her daughter. When the CBPO asked who AEC was, one of the occupants of the vehicle responded by stating she was ill. The CBPO referred the SUSPECT VEHICLE to secondary for further inspection at that time.

During the secondary inspection, it was determined that the subject for which the document bearing the name AEC, was not the true bearer of the document and was in fact a seventeen (17) year old minor undocumented citizen of Mexico. A pat down search of A. CORNEJO was conducted which yielded the discovery of a Mexican Passport Book bearing the true identity of the minor Mexican female.

Interviews were subsequently conducted of the minor Mexican female, A. CORNEJO, C. CORNEJO, I. CORNEJO, and CHAIREZ.

During the post-Miranda interview of A. CORNEJO, she admitted to being involved in the smuggling of illegal aliens (IAs) from Mexico into the U.S. via El Paso Ports of Entry. She stated she had instructed the minor Mexican female regarding how to behave when crossing into the U.S. She admitted she told CBPOs during secondary inspection that the minor Mexican female was ill because she was attempting to cross her into the U.S. as if she was her daughter, AEC. She admitted to having knowledge that the minor Mexican female did not possess documents to enter the U.S. She further admitted that C. CORNEJO, I. CORNEJO, and CHAIREZ were present in the vehicle with her in order to appear normal. She stated C. CORNEJO, I. CORNEJO, and CHAIREZ had crossed into the U.S. with her on previous occasions when she was smuggling IAs into the U.S. in the same manner. She stated she would pay C. CORNEJO \$250 USD, I. CORNEJO \$150 USD, and CHAIREZ \$150 every time they would cross into the U.S. with her with IAs in the SUSPECT VEHICLE. She stated C. CORNEJO knew the minor Mexican female was not her daughter. She further admitted she was paid \$1,200 USD for every minor she would smuggle into the U.S. between the ages of fifteen (15) and seventeen (17) years old and \$1,700 for every adult she would smuggle between the ages of eighteen (18) and twenty (20) years old.

During the post-Miranda interview of C. CORNEJO, she stated her husband had lost his job in Odessa, Texas and was in need of money. She stated she asked A. CORNEJO for money and A. CORNEJO told her she could help her with the smuggling of IAs. She stated A. CORNEJO offered to pay her \$200 USD for assisting her. She stated A. CORNEJO instructed her regarding what to tell the minor Mexican female to do when they were going to cross into the U.S. She stated she told the minor Mexican female to say she was her niece. She stated she knew the identification document presented for the minor Mexican female did not belong to her and admitted she knew the minor Mexican female was undocumented.

During the post-Miranda interview of I. CORNEJO, he stated he began assisting A. CORNEJO with smuggling IAs after they began speaking again approximately two (2) months prior. He stated he had crossed into the U.S. with A. CORNEJO while smuggling IAs approximately once or twice per week since he had begun assisting her. He stated A. CORNEJO would pay him between \$100 to \$150 USD every time he crossed into the U.S. with her while smuggling IAs. He stated the purpose of him crossing with her while smuggling IAs was to appear "normal". He stated CHAIREZ was present in the vehicle with them for the same purpose as

him, which was to appear normal. He stated he knew CHAIREZ was paid by A. CORNEJO as well but did not know how much. He stated CHAIREZ began crossing with them approximately one (1) month prior.

During the post-Miranda interview of CHAIREZ, he admitted he was being paid \$75 to \$100 USD to cross into the U.S. with A. CORNEJO. He stated he was there so that there would be more people in the vehicle when they would cross. He admitted that was the third time he had crossed into the U.S. with A. CORNEJO for that purpose. He stated he believed they were females that were crossed into the U.S. on each occasion. He admitted he believed it was probable that the subjects being crossed into the U.S. were undocumented. He stated he was going to be paid \$100 USD for crossing into the U.S. on that occasion (May 8, 2024).

Your affiant makes this affidavit based on his personal knowledge, as well as the basis of information furnished to him by other law enforcement officers. This affidavit is being submitted for the limited purpose of establishing probable cause for the arrest of April Marylou CORNEJO, Candy Valerie CORNEJO, Isaac David CORNEJO, and Brian Aron CHAIREZ and does not set forth all your affiant's knowledge about this matter.